

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA)	
)	
V.)	No. 3:22-CR-378-N
)	
RAYNALDO RIVERA ORTIZ, JR.)	ECF

DEFENDANT’S AMENDED EXHIBIT LIST

COMES NOW, Defendant, Raynaldo Rivera Ortiz, Jr., by and through his counsel, John M. Nicholson, in accordance with this Court’s Pretrial Order, hereby adopts all the Government’s exhibits and files the following, amended listing of exhibits:

Exhibit No.	Description	Offered	Admitted
01	August 02, 2022 – Surveillance Video CH 2; 0900 – 1000		
02	August 02, 2022 – Surveillance Video CH 2; 1000 - 1100		
03	August 02, 2022 – Surveillance Video CH2; 1600 - 1700		
04	Surveillance Clip 1 CH 2; 9:09:37 – 9:09:50		
05	Surveillance Clip 2 CH 2; 10:55:45 – 10:55:50		
06	Surveillance Clip 3 CH 2; 16:17:34 – 16:17:45		
07	August 03, 2022 – Surveillance Video CH 2; 0800 - 0900		
08	Surveillance Clip 4 CH 2; 8:23:08 – 8:23:17		

09	Surveillance Clip 5 CH 2; 8:31:14 – 8:31:26		
10	August 04, 2022 – Surveillance Video CH 2; 0900 - 1000		
11	August 04, 2022 – Surveillance Video CH 2; 1000 - 1100		
12	August 04, 2022 – Surveillance Video CH 2; 1200 - 1300		
13	Surveillance Clip 6 CH 2; 9:15:55 – 9:16:03		
14	Surveillance Clip 7 CH 2; 9:21:31 – 9:21:58		
15	Surveillance Clip 8 CH 2; 9:48:53 – 9:49:11		
16	Surveillance Clip 9 CH 2; 10:01:25 – 10:01:48		
17	Surveillance Clip 10 CH2; 10:26:35 – 10:26:49		
18	Surveillance Clip 11 CH 2; 10:53:44 – 10:53:53		
19	Surveillance Clip 12 CH 2; 10:54:37 – 10:54:55		
20	Surveillance Clip 13 CH 2; 10:59:37 – 10:59:22		
21	Surveillance Clip 14 CH 2; 12:35:39 – 12:36:01		
22	August 05, 2022 – Surveillance Video CH 2; 0800 - 0900		
23	August 05, 2022 – Surveillance Video CH 5; 1000 - 1100		

24	August 05, 2022 – Surveillance Video CH 2; 1500 - 1600		
25	Surveillance Clip 15 CH 2; 8:59:25 – 9:06:22		
26	Surveillance Clip 16 CH 5; 10:45:16 – 10:46:33		
27	Surveillance Clip 17 CH 2; 15:14:15 – 15:14:25		
28	August 08, 2022 – Surveillance Video CH 2; 0800 - 0900		
29	Surveillance Clip 18 CH 2; 8:01:20 – 8:01:35		
30	August 09, 2022 – Surveillance Video CH 2; 1100 - 1200		
31	August 09, 2022 – Surveillance Video CH 2; 1200 - 1300		
32	Surveillance Clip 19 CH 2; 11:21:44 – 11:21:57		
33	Surveillance Clip 20 CH 2; 11:56:25 – 11:56:34		
34	Surveillance Clip 21 CH 2; 12:07:43 – 12:12:16		
35	August 10, 2022 – Surveillance Video CH 2; 0700 - 0800		
36	August 10, 2022 – Surveillance Video CH 2; 0900 - 1000		
37	August 10, 2022 – Surveillance Video CH 2; 1300 - 1400		
38	Surveillance Clip 22 CH 2; 7:46:55 – 7:47:25		

39	Surveillance Clip 23 CH 2; 9:35:50 – 9:36:15		
40	Surveillance Clip 24 CH 2; 13:58:42 – 13:59:19		
41	August 11, 2022 – Surveillance Video CH 2; 1300 - 1400		
42	Surveillance Clip 25 CH 2; 13:18:28 – 13:18:43		
43	August 12, 2022 – Surveillance Video CH 2; 0900 - 1000		
44	Surveillance Clip 26 CH 2; 9:11:13 – 9:11:30		
45	August 15, 2022 – Surveillance Video CH 2; 0800 - 0900		
46	August 15, 2022 – Surveillance Video CH 2; 1200 - 1300		
47	Surveillance Clip 27 CH 2; 8:53:25 – 8:53:40		
48	Surveillance Clip 28 CH 2; 12:44:35 – 12:44:53		
49	August 16, 2022 – Surveillance Video CH 2; 0600 - 0700		
50	August 16, 2022 – Surveillance Video CH 2; 0900 1000		
51	August 16, 2022 – Surveillance Video CH 2; 1100 - 1200		
52	August 16, 2022 – Surveillance Video CH 2; 1200 - 1300		
53	August 16, 2022 – Surveillance Video CH 2; 1300 - 1400		

54	August 16, 2022 – Surveillance Video CH 2; 1400 - 1500		
55	August 16, 2022 – Surveillance Video CH 2; 1500 - 1600		
56	Surveillance Clip 29 CH 2; 6:44:00 – 6:44:07		
57	Surveillance Clip 30 CH 2; 9:59:36 – 9:59:39		
58	Surveillance Clip 31 CH 2; 10:20:20 – 10:20:38		
59	Surveillance Clip 32 CH 2; 11:20:18 – 11:20:38		
60	Surveillance Clip 33 CH 2; 11:53:19 – 11:53:43		
61	Surveillance Clip 34 CH 2; 15:02:28 – 15:02:57		
62	August 17, 2022 – Surveillance Video CH 2; 0800 - 0900		
63	August 17, 2022 – Surveillance Video CH 2; 1000 - 1100		
64	August 17, 2022 – Surveillance Video CH 2; 1300 - 1400		
65	August 17, 2022 – Surveillance Video CH 2; 1400 - 1500		
66	August 17, 2022 – Surveillance Video CH 2; 1500 - 1600		
67	August 17, 2022 – Surveillance Video CH 2; 1600 - 1700		
68	Surveillance Clip 35 CH 2; 8:03:36 – 8:04:22		

69	Surveillance Clip 36 CH 2; 8:31:00 – 8:31:14		
70	Surveillance Clip 37 CH 2; 8:31:40 – 8:31:53		
71	August 18, 2022 – Surveillance Video CH 2; 0600 - 0700		
72	August 18, 2022 – Surveillance Video CH 2; 0800 - 0900		
73	August 18, 2022 – Surveillance Video CH 2; 1000 - 1100		
74	August 18, 2022 – Surveillance Video CH 2; 1100 - 1200		
75	August 18, 2022 – Surveillance Video CH 2; 1200 - 1300		
76	August 18, 2022 – Surveillance Video CH 2; 1800 - 1900		
77	Surveillance Clip 38 CH 2; 6:31:33 – 6:34:14		
78	Surveillance Clip 39 CH 2; 12:19:55 – 12:20:11		
79	Surveillance Clip 40 CH 2; 12:24:45 – 12:25:10		
80	Surveillance Clip 41 CH 2; 18:28:58 – 18:29:15		
81	August 19, 2022 – Surveillance Video CH 2; 0900 - 1000		
82	August 19, 2022 – Surveillance Video CH 2; 1000 - 1100		
83	August 19, 2022 – Surveillance Video CH 2; 1100 - 1200		

84	Surveillance Clip 42 CH 2; 9:16:28 – 9:16:38		
85	Surveillance Clip 43 CH 2; 11:36:17 – 11:36:36		
86	August 22, 2022 – Surveillance Video CH 2; 0700 - 0800		
87	August 22, 2022 – Surveillance Video CH 2; 0800 - 0900		
88	August 22, 2022 – Surveillance Video CH 2; 1200 - 1300		
89	Surveillance Clip 44 CH 2; 7:47:51 – 7:48:12		
90	Surveillance Clip 45 CH 2; 8:55:20 – 8:55:34		
91	Surveillance Clip 46 CH 2; 12:50:13 – 12:50:25		
92	August 23, 2022 – Surveillance Video CH 2; 0900 - 1000		
93	August 23, 2022 – Surveillance Video CH 2; 1400 - 1500		
94	Surveillance Clip 47 CH 2; 9:23:30 – 9:32:54		
95	Surveillance Clip 48 CH 2; 9:36:15 – 9:36:54		
96	Surveillance Clip 49 CH 2; 9:37:20 – 9:37:40		
97	Surveillance Clip 50 CH 2; 9:39:30 – 9:39:55		
98	Surveillance Clip 51 CH 2; 14:20:05 – 14:20:21		

99	August 24, 2022 – Surveillance Video CH 2; 1200 - 1300		
100	August 24, 2022 – Surveillance Video CH 2; 1500 - 1600		
101	Surveillance Clip 52 CH 2; 12:20:58 – 12:21:12		
102	Surveillance Clip 53 CH 2; 12:43:00 – 12:44:25		
103	Surveillance Clip 54 CH 2; 15:52:10 – 15:52:21		
104	Verbeck Report		
105	UNT Lab Notes; GOV_8674 – GOV_8696		
106	Verbeck Chain of Custody; GOV_8697		
107	GC Slide		
108	GC Slide		
109	GC Slide		
110	GC Slide		
111	GC Slide		
112	GC Slide		
113	GC Slide		
114	GC Slide		
115	SWIFS file for K.P.; GOV_1932 – GOV_2009		
116	SWIFS file for J.A.; GOV_39962		
117	NMS file for J.A.; GOV_38565		
118	Terry Burson Certified Receipts; Churchwell & Merlo		
119	GAC Reports for Attorney		
120	Medical City Records – J.A.		

121	BSWND Records – J.A.		
122	Medical City Records – J.A.		
123	BSWND Records – J.E.		
124	Texas Health Resources Records – J.E.		
125	BSWND Records – K.P.		
126	BSWND Records – K.P.		
127	Medical City Records – K.P.		
128	Text Regarding M.K.’s Schedule		
129	Medical City Records – T.Y.		
130	BSWND Records – T.Y.		
131	Peer Review Communication		
132	Medications Releases for Testing		
133	Photographs of Medications		
134	BSWND Records – M.N.		
135	BSWND Records – J.R.		
136	BSWND Records – M.A.		
137	BSWND Records – A.H.		
138	BSWND Records – K.G.		
139	BSWND Records – L.S.		
140	BSWND Records – F.L.		
141	BSWND Records – M.D.		
142	BSWND Records – G.A.		
143	BSWNG Records – H.H.		
144	BSWNG Records – J.J.		
145	BSWNG Records – B.H.		
146	BSWNG Records – F.O.		
147	BSWNG Records – R.G.		
148	BSWNG Records – A.J.		

149	BSWNG Records – P.H.		
150	BSWNG Records – A.K.		
151	BSWNG Records – Y.W.		
152	BSWNG Records – D.K.		
153	BSWNG Records – C.M.		
154	BSWNG Records – T.K.		
155	BSWNG Records – I.R.		
156	BSWNG Records – R.D.		
157	BSWNG Records – J.M.		
158	Photograph of IV Bags (4)		
159	BSWNG Communications		
160	BSWNG Reporting		
161	Photograph of Medicine Cabinet (both doors) at BSWND		
162	Photograph of Poster at BSWND		
163	IV Bags		
164	DPD Case No. 154572-2022; Dated 12/29/2023; pgs. 1 - 18		
165	DPD Case No. 154572-2022; Dated 01/08/2024; pgs. 19 - 32		
166	RESERVED		
167	RESERVED		
168	RESERVED		
169	RESERVED		
170	RESERVED		

DATED: March 28, 2024.

Respectfully submitted,

/s/ John M. Nicholson

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CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2024, I electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. The electronic case filing system sent a “Notice of Electronic Filing” to the following attorneys of record who have consented in writing to accept this notice as service of this document by electronic means to john.delagarza@usdoj.gov.

/s/ John M. Nicholson
JOHN M. NICHOLSON